**Data Classification** questions Petr Brym lacked time to answer during the April 2025 Forum:

1. **Are human subjects automatically P4 for protection level for medical studies?**

I would recommend starting with P4 until or unless it is demonstrated that it is less than that. For example, if it can be demonstrated that the source of the information is public sources, or if it can be demonstrated that the information is de-identified with no option to re-identify it, we may be able to say that it is of lower data classification. Often we end up consulting with the IRB or Privacy office on this, because the definitions of de-identification, anonymous, and re-identification are tricky.

1. **Can you describe which data storage solutions do not require a VRA? For example, use of UC Davis instance of Box, REDCap, Qualtrics, etc.**

The general rule of “are you obtaining a service or product from a third party” applies. So with the examples given, Box and Qualtrics definitely are third party service providers, so yes. Depending on when the researcher asks, we may have a current VRA on file. We would just need to see if the VRA assessed the provider for the type of use the researcher needs. Do they need P4, P3, GDPR, HIPAA, alignment with ISO or NIST standards, etc.

I am not fully familiar with the details about how UC Davis REDCap is managed, but my understanding is that it is hosted in AWS and that the software is provided by a Consortium. As such, a VRA would apply. But likely, if asked to do one, ISO would attempt a VRA that can serve many researchers. Also, consulting with UC Davis Health would be appropriate, because I see that UCDH may also be using it.

The thing that is important to emphasize is that when the ISO receives a VRA request, the request is processed through a careful triage program to be sure we understand the use case, so we can offer a well-informed answer about whether a VRA is needed , so we can check whether a recent VRA is available, and so we can see if the VRA aligns well enough with the requester’s needs. For this reason, general questions are helpful for a general dialogue and understanding, but at least for the short term, I suggest that researchers submit a VRA request to ensure we can offer a well-informed answer about their situation.